

# Order execution policy

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## Regulation

This order execution policy aims to inform the company's clients about how orders are executed by Lind Capital Fondsmæglerselskab A/S (hereafter referred to as LCFM).

Furthermore, this policy will help to ensure that orders are executed according to a consistent progress method that guarantees that the client gets best possible execution.

LCFM must obtain the client's consent to the order execution policy, before the first trade can be initiated by the client according to act no. 917 of 25 June 2017 regarding execution of orders by traders of securities and the Commission's delegated regulation no. 2017/565 of 25 April 2017.

## Best execution

LCFM executes orders for clients according to best execution principles, which means that when executing received orders, LCFM must take all sufficient measures to achieve the best possible result for its clients within the given circumstances.

The best results are obtained by comparing price, costs, speed, probability of execution and settlement, size, nature, and other matters relevant to execution of the order. The weighting of these parameters will vary but typically price and speed are pivotal. In the case of a large order; the company may attach greater importance to other factors, if the order is expected to suffer a significant price impact or impact the probability of the expedition of the order.

## Trading places

LCFM can either execute client orders directly on an exchange or through trading outside a regulated market where LCFM completes the client's order with LCFM as counterparty or by matching the client's order against those of another of its clients.

Finally, the order could be carried out by a third party, as LCFM has signed an agreement on the handling of orders on the relevant exchange/marketplace.

## LCFM has the following execution venues:

- Nasdaq OMX (equities and bonds)
- Bloomberg MTF
- Market Axess MTF

## Order and trade types

LCFM deals with two different types of orders and trades:

- Limit order
- Market order
- Commission trade
- Indicative or fixed price trade

## Limit Order

A limit order is an order which LCFM carries out on behalf of the client and at the client's risk, where the client has set the maximum or minimum price at which LCFM must act, depending on whether it is a purchase or a sale. Once the order is completed, the client is charged the average trading price, plus or minus a commission, depending on whether there is a purchase or a sale.

Orders will be valid until the end of the day, unless otherwise agreed with the client.

### **Market Order**

A market order is an order which LCFM carries out on behalf of the client and at the client's risk. Once the order is completed, the client is charged the average trading price, plus or minus a commission, depending on whether there is a purchase or a sale.

### **Commission Trade**

Commission trade is a trade that LCFM carries out on behalf of the client and at the client's risk. Taking the regulations on Best Execution into account, LCFM must choose which trading platform is most appropriate for each order.

### **Indicative or fixed price trade**

In the case of an indicative or fixed price trade, LCFM quotes indicative or fixed prices directly to the client. An agreement is made between the client and LCFM, when the client accepts a fixed price quoted by LCFM, or, in the case of an indicative price, when LCFM has confirmed the price to the client and the client confirms the price.

In the case of an indicative or fixed price trade, a trade is made between LCFM and the client, and for this reason, LCFM does not execute an order on the client's expense. This means that indicative or fixed price trades are not included in this policy, and LCFM is not obligated to ensure Best Execution.

Prices are quoted including all costs or with subsequent attributed or deducted commission, depending on what has been agreed upon with the client.

### **Order execution**

LCFM can choose to combine several client orders if it is unlikely that the aggregation of orders and trades result in the detriment of one of the clients. An aggregated order, when completely executed, will be distributed to the average price. A partially executed order will be distributed proportionally to the average price. In case of client orders and orders against the company's portfolio are aggregated, client orders are settled so that it is not to the detriment of the client.

### **Other**

LCFM has the right to decline an order without being obligated to tell on what ground.

In case of a disruption in the market, or in LCFM's systems, as a result of, for example, technical problems, LCFM may find it impossible or disadvantageous to carry out the order in accordance with this policy. In this case, LCFM will take all possible steps to achieve the best result in a different way for the client.

### **Updates**

Once a year, the Order Execution Policy will be updated, if required. Changes will be available on our website <https://lcfm.dk/wp-content/uploads/2020/12/Ordreudfoerelsespolitik.pdf>. Changes are effective once they have been published on the website.